



**Jessica M. Baquet**  
Partner  
(516) 393-8292  
[jbaquet@jaspanllp.com](mailto:jbaquet@jaspanllp.com)  
REPLY TO GARDEN CITY OFFICE

December 29, 2016

**Via ECF**

Hon. Denis R. Hurley  
U.S. District Court for the Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 10722-9014

**Re: Lawrence v. Sol G. Atlas Realty Co., Inc., et al.  
14-cv-3616 (DRH)(GRB)**

Dear Judge Hurley:

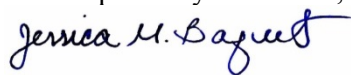
This firm represents defendants, Sol G. Atlas Realty Co., Inc., Sandra Atlas Bass and Peter Fidos, in the above-captioned action.

On December 16, 2016, the Court issued a Memorandum and Opinion (the "Decision") which granted in part and denied in part defendant's motion to dismiss plaintiff's Complaint in this action. The Decision also granted plaintiff leave to replead within twenty days thereof.

Pursuant to Fed R. Civ. P. 12(a)(4)(A), defendants are due to file an answer to plaintiff's Complaint by December 30, 2016. However, plaintiff's counsel has informed me that plaintiff intends to file an Amended Complaint pursuant to the Decision. As such, I requested that plaintiff consent to a fourteen (14) day extension of defendants' time to answer the original Complaint. If plaintiff files an Amended Complaint during this extension, it will moot defendants' obligation to answer the original Complaint and defendants will answer the Amended Complaint within twenty-one (21) days of service as provided by Fed R. Civ. P. 12(a)(1)(A)(i). If he does not, it will allow defendants sufficient time to respond to the original Complaint in light of counsel's holiday travel schedules and other professional commitments.

Plaintiff's counsel has consented to the above request. As such, defendants respectfully request that the Court approve the foregoing extension.

Thank you for your consideration of this matter.

Respectfully submitted,  
  
Jessica M. Baquet

cc: Andrew S. Goodstadt, Esq. (via ECF)